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**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

DATED: 4:58 pm, September 15, 2020

U.S. MAGISTRATE JUDGE

1 NICHOLAS A. TRUTANICH
2 United States Attorney
3 District of Nevada
4 Nevada Bar Number 13644
5 LISA C. CARTIER GIROUX
6 Nevada Bar No. 14040
7 Email: Lisa.Cartier-Giroux@usdoj.gov
8 KIMBERLY SOKOLICH
9 Email: Kimberly.Sokolich@usdoj.gov
10 Assistant United States Attorney
11 501 Las Vegas Boulevard South, Suite 1100
12 Las Vegas, Nevada 89101
13 Phone: (702) 388-6336

Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA.

Case No. 2:20-mj-821-BNW

11 Plaintiff

COMPLAINT FOR VIOLATION OF:

12 | vs

Count One:
Depredation Against Property of the United States – 18 U.S.C. §§ 1361 and 2

13 REGINALD LEWIS

14 || **Defendant.**

15 BEFORE the Honorable Brenda Weksler, United States Magistrate Judge, Las Vegas,
16 Nevada, the undersigned Complainant, being duly sworn, deposes and states:

Count One

(Depredation Against Property of the United States)

On or about May 30, 2020, in the state and Federal District of Nevada,

REGINALD LEWIS,

21 defendant herein, willfully and by means of repeatedly kicking the windows of a building, did
22 injure and commit a depredation against property of the United States and of any department
or agency thereof, and property which had been manufactured and constructed for the United

1 States, and any department or agency thereof, specifically the Foley Federal Building, located
2 at 300 South Las Vegas Boulevard, Las Vegas, Nevada 89101, and the resulting damage was
3 over one thousand dollars (\$1000.00) all in violation of Title 18, United States Code, Sections
4 1361 and 2.

5 PROBABLE CAUSE AFFIDAVIT

6 1. Your Complainant is a Special Agent with the Federal Bureau of Investigation
7 (FBI), has been so employed since January 10, 2019, and is currently assigned to the Las Vegas
8 Field Office. Prior to this, he was a police officer for 10 years with the North Las Vegas Police
9 Department and Western Illinois University Police Department. As an FBI Agent,
10 your Complainant is assigned to the FBI's Las Vegas Violent Crimes Task Force and is
11 responsible for investigating a variety of violent crimes, to include bank robbery, kidnapping,
12 extortion, robbery, carjackings, assaults and murders of federal officers, racketeering related
13 violent offenses, as well as long-term investigations into the activities and operations of career
14 criminals, criminal enterprises, drug trafficking organizations, and violent street
15 gangs. Your Complainant has experience in conducting criminal investigations, including the
16 investigation of criminal groups and conspiracies as well as the collection of evidence and the
identification and use of witnesses.

17 2. The following information contained within this criminal complaint is based on
18 your Complainant's participation in this investigation or was provided to him by other law
19 enforcement personnel. I have not included every fact known to be concerning this offense. I
20 have set forth only the facts I believe are essential to establish the necessary foundation for this
21 Complaint. All times noted are approximate.

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FACTS ESTABLISHING PROBABLE CAUSE

2 3. On May 30, 2020, in Las Vegas, Nevada, large crowds gathered in multiple
3 locations of the Downtown area. A crowd arrived at the Lloyd D George Courthouse, located
4 at 333 South Las Vegas Boulevard, Las Vegas, Nevada and the Foley Federal Building (FFB),
5 located at 300 South Las Vegas Boulevard, Las Vegas at approximately 10:15p.m. Participants
6 in the protest became more boisterous, fireworks were set off, the walls near the buildings were
7 spray painted with obscenities and anti-law enforcement graffiti, and several small bushes of the
8 landscaping were lit on fire. Multiple individuals went to the east entrance of the FFB and
9 began to throw paint on the windows and caused physical damage to the building. Individuals
10 kicked the windows and doors to damage or break them to make entry, spray painted windows,
11 and attempted to break windows with a hammer, metal bars, and the metal letters torn off from
the sign that read, "FOLEY FEDERAL BUILDING UNITED STATES COURTHOUSE."

12 4. An on-duty Federal Protective Service (FPS) Protection Security Officer (PSO)
13 T.W., who was stationed inside the FFB, witnessed the damage and attempted break-in at the
14 building. T.W. stated the crowd outside could see him inside the building and said, "Get him!"
15 "Get the cop!" T.W. was in fear of the crowd breaking through the windows and door and was
16 in fear of the potential actions of the individuals against his person if they successfully made
17 entry. Ultimately, additional police units arrived inside the building and the crowd was
18 dispersed. Some letters torn from the FFB were taken by individuals and not recovered. The
Lloyd D. George Federal Courthouse was also damaged during this time.

1 6. On June 3, 2020, the General Services (GSA) completed a damage estimate for
2 the repair and clean-up of the FFB property. The estimate totaled seventy one thousand three
3 hundred thirty five dollars and seventy-two cents (\$71,335.72).

4 7. The FFB was equipped with surveillance cameras on the exterior of the building
5 which captured footage of individuals who damaged the building on May 30, 2020. One
6 individual who was captured on the surveillance footage damaging the FFB was later positively
7 identified by investigators as REGINALD LEWIS (hereinafter referred to as "LEWIS").
8 LEWIS, a black male adult, wearing a black mask, a red "durag," sunglasses, plain white t-
9 shirt, red athletic pants with a thick white stripe down each side, black sandals and a black
10 shoulder bag, was observed in the FFB video footage and other social media videos damaging
11 or attempting to damage the building by kicking the windows of the building. When LEWIS
was kicking the building, his mask was not on his face, but was below his chin.

12 8. On FFB security Camera 19 at approximately 22:20:28, 22:20:32 and 22:20:36,
13 LEWIS was seen kicking the windows on the north end of the east entrance patio. LEWIS
14 kicked the windows a total of six (6) times. LEWIS was accompanied by a black female adult,
15 identified as JEANETTE WALLACE (hereinafter referred to as "WALLACE"). WALLACE
had long braided blonde-highlighted hair and was wearing an orange jacket with blue jeans.
16 WALLACE similarly participated in damaging the FFB by kicking the doors and windows.
17 LEWIS appeared to follow WALLACE around and record the damage being done on his
18 cellphone.

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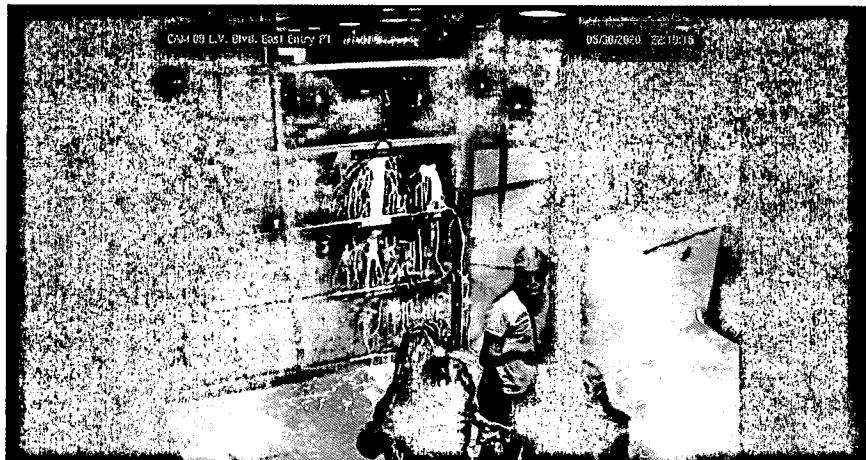


Image #1 – 05/30/2020 - Foley Federal Building Security Camera 9, LEWIS and WALLACE at FFB east patio windows.

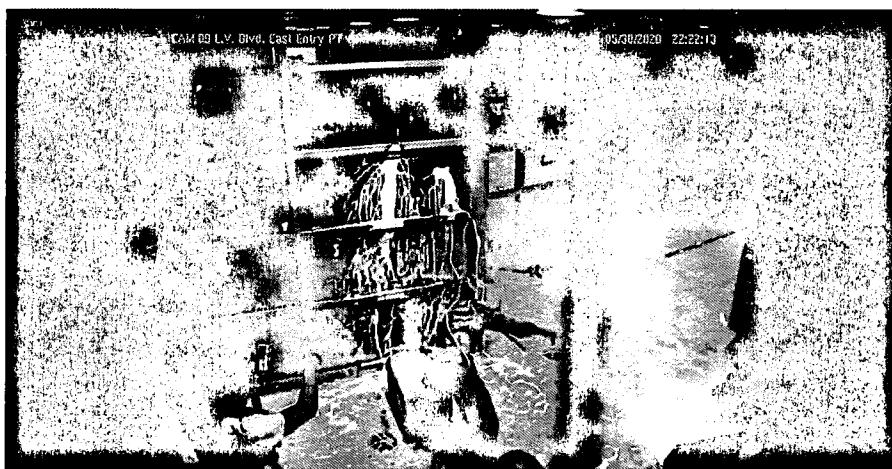


Image #2 – 05/30/2020 - Foley Federal Building Security Camera 9, LEWIS recording WALLACE and damage at FFB east patio windows.



Image #3 – 05/30/2020 - Foley Federal Building Security Camera 19, LEWIS kicking FFB windows.



Image #4 – 05/30/2020 - Foley Federal Building Security Camera 19, LEWIS kicking FFB windows.

9. LEWIS and WALLACE were also observed in a social media video on
10 YouTube of a live stream posted by user name “Abandoned Explained” titled “LIVE: George
11 Floyd Protest in Downtown Las Vegas,” which recorded protests in the Downtown Las Vegas
12 area and the damage at the FFB on May 30, 2020. At the 2:00:43, 2:00:47, and 2:00:51 marks,
13 LEWIS was observed kicking the windows of the FFB. At the 2:01:10 mark of the same video,
14 LEWIS appeared to be using his phone to record the damage to the building—specifically,
15 WALLACE throwing items at the FFB.



Image #5 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS kicking FFB.



7 Image #6 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS kicking FFB.



14 Image #7 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS kicking FFB.



Image #8 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS appears to be recording damage with cellphone.



Image #9 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS in red durag, white shirt, and red pants holding cellphone.

10. Agents interviewed WALLACE on August 3, 2020. WALLACE admitted to
11 damaging the FFB on May 30, 2020 and was shown still photos (Images #2 and #8) from the
12 surveillance and YouTube videos. WALLACE identified the black male wearing the red durag,
white shirt, and red pants as her friend “Ray,” or REGINALD LEWIS.

13. Your Complainant conducted database checks of LEWIS, to include Nevada
14 Department of Motor Vehicle checks. These checks showed LEWIS had the same likeness and
15 body build as the individual who caused damage to the FFB.

16. After searching Facebook for the name “REGINALD LEWIS,” your Affiant
17 discovered LEWIS had a Facebook profile under the name “Raee Toon,”
18 <https://www.facebook.com/raee.toon>. The individual in the profile photo and other photos on
19 LEWIS’ Facebook appeared to be the same individual as seen in the surveillance footage. The
20 individual in the Facebook photos also bore the same likeness as LEWIS’ driver’s license
image. The profile showed that LEWIS was also Facebook friends with WALLACE.

21. On his Facebook profile, LEWIS posted live videos from the protests in Las
22 Vegas on May 30, 2020, including of himself and WALLACE damaging the FFB. In the
23 videos, LEWIS is wearing the same clothes he was seen wearing in the FFB and YouTube

1 surveillance footage. Additionally, LEWIS had several photos on his Facebook account on
2 different dates wearing a red "durag" similar to the one he wore the night he damaged the FFB
3 building.



13 Image #10 – 09/09/2020 – from Facebook page "Raee Toon," still photo of LEWIS
14 from live video LEWIS posted during the May 30, 2020 protests at the FFB.

15 14. On September 8, 2020, agents conducted surveillance at LEWIS' known
16 residence and saw LEWIS leaving the residence. Agents confirmed that LEWIS appears to be
17 the individual in the FFB surveillance footage and in the live videos from the Facebook page
18 "Raee Toon" damaging the FFB along with WALLACE on May 30, 2020.
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CONCLUSION

15. Based on the foregoing facts and information, Your Complainant believes there is probable cause to believe that REGINALD LEWIS did commit a violation of 18 U.S.C. §§ 1361 and 2 – Depredation Against property of the United States.

Special Agent Zachary Franklin
Federal Bureau of Investigation

Attested to by the Applicant in accordance with the requirements of Fed. R. Crim. P. 41 by telephone on this 15th day of September, 2020.

**THE HONORABLE BRENDA WALKER
UNITED STATES MAGISTRATE JUDGE**

